

Exhibit 4

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February 5, 2021

VIA EMAIL

Southern Poverty Law Center
Attn: Meredith B. Stewart
P.O. Box 57089
New Orleans, LA 70157
Meredith.Stewart@splcenter.org

Re: *Barrientos v. CoreCivic, Inc.* (Case No. 4:18-cv-00070-CDL); Subpoena to Produce Documents (the “*Subpoena*”) to Trinity Services Group, Inc. (“*Trinity*”)

Dear Meredith:

I write to summarize our position in response to your February 3, 2021 summary of the remaining issues and our February 4, 2021 call. First, with regard to Request No. 2, Trinity supports Plaintiffs’ plan to ask the Court for additional time to resolve any disputes specific to the ESI production. With regard to the ESI containing PHI/PII, as discussed in more detail below, Trinity is not willing to produce such protected information without redactions applied, and such redactions will only occur at the expense of the Plaintiffs. Trinity is also, of course, willing to produce these documents unredacted in response to a Court Order requiring the same. Second, Trinity stands on its objection to Request No. 4. Lastly, with regard to Request No. 6, Trinity continues to object to the production of the 2020 CoreCivic contract. It is our understanding however, that CoreCivic intends to produce the 2020 CoreCivic contract to Plaintiffs, barring in issues that may arise on their end.

REQUEST NO. 2

As discussed on our call, we agree with your decision to ask the Court for additional time with regard to the ESI issues. We will await receipt of your draft status update for our review and signoff in light of the February 8, 2021 deadline.

As noted, review and production is ongoing. Trinity produced its first batch of documents to Plaintiffs on January 28, 2021. Trinity’s review team is continuing to work diligently to produce the remaining non-privileged, responsive documents that do not involve PII/PHI—roughly 700 or so additional documents. As noted, the parties have agreed to

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deprioritize the vendor domains and calendar invites and Trinity maintains that these documents will be produced to the extent that they are not privileged/do not contain PII/PHI. The majority of remaining emails contain PII/PHI and are therefore being held back. As we noted on our February 4, 2021 call and in previous email correspondence, these emails contain full lists of all inmates currently incarcerated—the vast majority of whom are not parties to the suit—along with inmate numbers, and DOB's. At this time Trinity objects to unredacted production of these documents containing PII/PHI and will await Court adjudication on that specific issue should it be raised with the Court.

Lastly, Trinity continues to incur significant expense related to this production. The cost of the Phase 1 ESI production alone is in excess of \$40,000. Plaintiffs' have stated that Phase 2 remains on hold until the resolve of Phase 1 production. Trinity reserves its right to request additional payment for expenses incurred prior to any further production outside of Phase 1.

REQUEST NO. 4

The parties have reached an impasse here. Trinity stands on its objection to the production of the identities, job assignments, and payroll information of the Trinity SDC staff on the grounds that the information sought is not relevant to establishing a baseline for compensation or unjust enrichment as set forth in the Complaint. Trinity employees working at SDC maintain food service director and/or supervisory roles. They are paid by Trinity as Trinity employees. Trinity has produced job descriptions of both Trinity civilians and detainees evidencing that detainees to not perform the same tasks as Trinity employees.

REQUEST NO. 6

As noted on our call, Trinity stands on its objection to producing the current 2020 CoreCivic contract. CoreCivic is a party to the suit and the contract is clearly equally available from them. After reaching out to CoreCivic, Trinity understands that pending their review and redactions to the 2020 CoreCivic contract, CoreCivic intends to produce the contract to Plaintiffs.

Sincerely,

/s/ Jonathan T. Edwards

Jonathan T. Edwards

cc: Alex Chosid, Alex.Chosid@tkcholdings.com